

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

JOE ANDREW SALAZAR,

Plaintiff,

v.

AT&T MOBILITY LLC,  
SPRINT/UNITED MANAGEMENT  
COMPANY, T-MOBILE USA, INC.,  
AND CELLCO PARTNERSHIP D/B/A  
VERIZON WIRELESS,

Defendants

and

HTC CORP., and HTC AMERICA, INC.,

Intervenors.

Civil Action No. 2:20-cv-00004-JRG

JURY TRIAL DEMANDED

**DECLARATION OF ANYA ENGEL**

I, Anya Engel, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746 under the laws of the United States of America, that the following is true and correct:

1. I am an associate attorney of Keyhani LLC, attorneys for Plaintiff Joe Andrew Salazar in the above captioned case. I am a member in good standing of the New York State Bar. I am over 21 years of age. I have personal knowledge of the following facts or access to information allowing me to confirm these facts.

2. Attached as Exhibit A is a true and correct copy of United States Patent No. 5,802,467.

3. Attached as Exhibit B is a true and correct copy of Joe Andrew Salazar's October 31, 1997 response to the United States Patent and Trademark Office (USPTO)'s Office Action dated May 1, 1997.

4. Attached as Exhibit C is a true and correct copy of the USPTO's Notice of Allowability for application number 08/535,801 dated February 17, 1998.

5. Attached as Exhibit D is a true and correct copy of Defendants' and Intervenor's Invalidity Contentions in *Salazar v. AT&T Mobility LLC, et al.*, No. 2:20-CV-00004-JRG, dated February 6, 2020.

6. Attached as Exhibit E is a true and correct copy of HTC's Proposed Constructions and Identification of Evidence in *Salazar v. HTC Corp.*, No. 2:16-cv-01096-JRG (Dkt. #73-3), dated August 1, 2017.

7. Attached as Exhibit F is a true and correct copy of the Court's Claim Construction Opinion and Order in *Salazar v. HTC Corp.*, No. 2:16-cv-01096-JRG (Dkt. #108), dated November 3, 2017.

8. Attached as Exhibit G is a true and correct copy of HTC Corporation's Objections to Claim Construction Opinion and Order in *Salazar v. HTC Corp.*, No. 2:16-cv-01096-JRG (Dkt. #112), dated November 17, 2017.

9. Attached as Exhibit H is a true and correct copy of the Court's Order Overruling Objections in *Salazar v. HTC Corp.*, No. 2:16-cv-01096-JRG (Dkt. #155), dated February 13, 2018.

10. Attached as Exhibit I is a true and correct copy of the Court's Report and Recommendation in *Salazar v. HTC Corp.*, No. 2:16-cv-01096-JRG (Dkt. #250), dated May 1, 2018.

Dated: June 10, 2020

s/ Anya Engel  
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